

Exhibit 3

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF NEW JERSEY
2 CAMDEN VICINAGE

3

4 IN RE: VALSARTAN, : MDL NO. 2875
LOSARTAN, AND :
IRBESARTAN PRODUCTS : CIVIL NO.
5 LIABILITY LITIGATION : 19-2875
: (RBK/JS)

6

7 THIS DOCUMENT APPLIES : HON. ROBERT
8 TO ALL CASES : B. KUGLER
9 - CONFIDENTIAL INFORMATION -
10 SUBJECT TO PROTECTIVE ORDER

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11

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14 Videotaped remote deposition of
ERIC GU, Ph.D., taken pursuant to notice,
15 was held via Zoom Videoconference,
beginning at 7:02 a.m., China Standard
16 Time, on the above date, before Michelle
L. Gray, a Registered Professional
17 Reporter, Certified Shorthand Reporter,
Certified Realtime Reporter, and Notary
18 Public.

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GOLKOW LITIGATION SERVICES
877.370.3377 ph | 917.591.5672 fax
deps@golkow.com

1 product. Okay. Valsartan is a very old
2 product. So that's not including
3 valsartan.

4 Q. This says in the second
5 bullet point, "Provide CMC service for
6 NCE development."

7 What does that mean?

8 A. CMC service for the NCE --
9 NCE is new chemical entity, okay. We
10 develop the, you know, chemical process
11 and the manufacturing service to those,
12 you know, new compounds, okay, new
13 chemicals.

14 Q. The third bullet point says,
15 "Providing process research and
16 development scaleup and tech support
17 services."

18 A. Yes. We develop the process
19 research at the laboratory scales, and
20 scale up is to kilogram scale at the lab
21 and, you know, tech support for the pilot
22 program manufacturing process.

23 Q. Let's break that down a
24 little. Where you said providing process

1 you could, to Page 75, is the last
2 two digits.

3 BY MR. SLATER:

4 Q. This is the final page of
5 this report. And Number 6 says, "Future
6 improvement."

7 A. Mm - hmm.

8 Q. "The synthesis process of
9 crude valsartan and the purification
10 process, including the solvent system,
11 need to be further optimized at the pilot
12 scale."

13 And then in the bottom right
14 it has Shanghai SynCores Technologies,
15 Inc., January 20, 2011.

16 A. Mm-hmm. Yes.

17 Q. What is that referring to in
18 terms of what needed to be further
19 optimized at the pilot scale?

20 A. That's -- that is, you
21 know -- almost you can find those in
22 many, many of the reports, because we did
23 the laboratory scale, okay. They're
24 going to take that into the pilot scale.